

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

RAMON MITCHELL, ERIC CARTER,
TREMAIN GORDON and EMILY JONES

AMENDED
CRIMINAL COMPLAINT

CASE NUMBER: 08 CR 50039

FILED
AUG 19 2008
MAGISTRATE JUDGE P. MICHAEL MAHONEY
United States District Court

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about August 14, 2008, at Roscoe, in the Northern District of Illinois, Western Division, defendants herein:

by intimidation, did take from the person and presence of employees of the Blackhawk State Bank, 5206 Elevator Road, Roscoe, Illinois, approximately \$122,992 in money belonging to and in the care, custody, control, management, and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

in violation of Title 18, United States Code, Section 2113 (a). I further state that I am a FBI Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Casimer J. Solana

Signature of Complainant
Casimer Solana, Special Agent, FBI

Sworn to before me and subscribed in my presence,

August 19, 2008

Date

at Rockford, Illinois

City and State

P. Michael Mahoney, U.S. Magistrate Judge
Name & Title of Judicial Officer

P. Michael Mahoney
Signature of Judicial Officer

NORTHERN DISTRICT OF ILLINOIS)
) ss.
WESTERN DIVISION)

AFFIDAVIT

I, Casimer Solana, being duly sworn on oath, hereby state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for over nine years. As a Special Agent with the FBI, my current duties include the investigation of robberies and attempted robberies of federally insured financial institutions in violation of 18 U.S.C. § 2113.

2. During the performance of my duties as a Special Agent with the FBI, I have participated with other law enforcement agents and officers in the investigation of a robbery of the Blackhawk State Bank, 5206 Elevator Road, Roscoe, Illinois (hereinafter referred to as "Blackhawk State Bank") which occurred August 14, 2008 at approximately 3:00 p.m.

3. This affidavit is submitted in support of the attached complaint. Other federal and local law enforcement officers have participated in this investigation and I have discussed the results of their investigation into this matter with them. This affidavit is based in part upon those discussions as well as my own investigation and observations. This affidavit does not contain all of the information concerning the investigation that is known to me, but sets forth only those relevant facts necessary to establish probable cause that the defendants committed the offense charged in the complaint. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only.

4. On August 14, 2008, I responded to the Blackhawk State Bank after employees had reported that a robbery had occurred. I spoke with Emily Jones (hereinafter referred to as "Jones"). Jones

told me that she was employed as a teller at Blackhawk State Bank. Jones said that at approximately 3:00 p.m. on August 14, 2008, a black male entered the Blackhawk State Bank and approached her teller window. The black male gave Jones a multi-colored red and white backpack and piece of paper. Jones said that the piece of paper said give me all of your money and all of the money in the drive through. After reading the note, Jones said that she put the money from her teller drawer into the backpack except for the "bait" money in her teller drawer. Blackhawk State Bank places "bait" money, which are bills for which the serial numbers have previously been recorded, in each teller's drawer. As Jones was putting the money into the backpack, Jones said she saw a pair of purple and yellow shoes in the backpack. Jones initially attempted to give the bag back to the black male but the black male told Jones to give him all of the money. Jones then walked with the backpack to the drive through counter. Jones said that when she went back to drive through counter she told another teller (hereinafter "Teller B") to pull Teller B's bait bills from her drawer because Jones forgot to do so. Jones said that Teller B told her that they would pull Teller B's bait bills after the black male left. Jones said that Jones and Teller B then walked to a counter near the teller counter for the drive through. That counter had approximately \$95,000 in United States Currency on it that bank employees were in the process of counting and preparing to place in the bank's ATM machine. Jones and Teller B then placed all of the approximately \$95,000 in United States Currency into the backpack. After placing the money in the backpack, Jones took the backpack back to Jones's counter and gave the backpack and the piece of paper back to the black male. The black male then left the bank. Jones described the black male as being in his early twenties, thin, 150 pounds, light skinned with freckles on his face and "jagged" teeth. Jones said the black male was wearing plastic dark sunglasses with large, "goggle-like" lenses.

5. The branch manager of Blackhawk State Bank, Becky Brown, told me that the deposits of the Blackhawk State Bank were insured by the FDIC on August 14, 2008.

6. On August 15, 2008, an individual (hereinafter referred to as "CI") contacted the Beloit, Wisconsin Police Department regarding having information about a bank robbery in Roscoe, Illinois. The Beloit Police Department referred the CI to the Roscoe, Illinois Police Department. At approximately 3:30 p.m. on August 15, 2008, the CI met with Detective Sam Hawley of the Roscoe Police Department. The CI told Detective Hawley that earlier in the day on August 15, 2008, the CI was in a car with a male who had \$200 cash. The CI asked the male where he obtained the \$200. The male initially refused to tell the CI where he obtained the money, but eventually told the CI that another male named "Grizzle," gave him the money. The male told the CI that Grizzle got \$100,000 from a bank robbery in Roscoe. Grizzle further told the male that three or four people took part in the robbery and that each person received approximately \$20,000. The male gave the CI \$20 and said it was part of the money given to the male by Grizzle. The CI provided Detective Hawley with that \$20 bill.

7. The CI further told Detective Hawley that after meeting with the male and obtaining the \$20, he went to Grizzle's residence at 1305 Harvey Street, Beloit, Wisconsin (hereinafter referred to as "1305 Harvey Street"). The CI met with Grizzle and asked him for some money. The CI saw a red 1979 or 1980 Chevy Caprice with spoked wheel rims parked at 1305 Harvey. The CI asked Grizzle about the car. Grizzle told the CI that he bought a car from a male named "Little Man" earlier on August 15, 2008 who lives on Copeland Street, Beloit. After leaving Grizzle's house, the CI went and met with Detective Hawley at approximately 3:30 p.m. on August 15, 2008. During the meeting the CI, the CI described Grizzle as a black male, 5'11", 160 pounds, light complexion and "messed-

up" front teeth. Detective Hawley showed the CI a still photograph taken from the Blackhawk State Bank surveillance video at the time of the bank robbery. The CI identified the black male who was at Jones's counter as the individual the CI knows as Grizzle.

8. After meeting with Detective Hawley, the CI returned to 1305 Harvey Street and obtained the license plate number for the Chevy Caprice. The CI called Detective Hawley and told him that the license plate for the Chevy Caprice was a State of Wisconsin plate and the number was 879NYJ. Detective Hawley checked motor vehicle registration records for the State of Wisconsin and determined that the Chevy Caprice is registered to Inman Jones who resides on Copeland Street in Beloit, Wisconsin.

9. Later on August 15, 2008, the CI called Detective Hawley and said that he was at Grizzle's house and Grizzle told the CI that an individual named "Eric," who drives a maroon Monte Carlo, was involved in the bank robbery at the bank in Roscoe and that Eric received \$34,000 from the bank robbery proceeds. The CI provided Detective Hawley with the license plate for the Monte Carlo and Detective Hawley determined from Wisconsin motor vehicle records that it was registered to Heather Keker who resides in Plymouth, Wisconsin.

10. The CI called Detective Hawley again at approximately 5:55 p.m. and told Detective Hawley that he was in the residence at 1305 Harvey Street but that Grizzle had left to go purchase cocaine from the same individual from whom Grizzle had purchased the Chevy Caprice.

11. Based upon my training and experience and my discussions with other people knowledgeable about methods, schemes and operations used by individuals who commit bank robberies, I know that such individuals:

a. Commonly use cellular telephones to communicate with each during the planning and execution of bank robberies;

b. Commonly conceal the robbery proceeds and other items used in the commission of the robbery, such as items used to conceal their identity, at their residences;

12. On August 15, 2008, a federal Magistrate Judge in the Western District of Wisconsin issued a search warrant for 1305 Harvey Street. On August 16, 2008, at approximately 7:00 a.m., federal and local law enforcement agents executed the search warrant at 1305 Harvey. Agents located and seized \$1,000 in twenty dollar bills from the residence. At the time the search warrant was executed agents located Ramon Mitchell in an upstairs bedroom inside the residence. Agents searched the bedroom where Ramon Mitchell was located and found a picture ID with the name Ramon Mitchell and birth certificate in the name of Ramon Mitchell. The picture on the ID matched the individual located in the bedroom. Agents also located Lyndzie Clark and a six year old child in the same room with Ramon Mitchell. Agents also located Jessica Clark and Carlos Royster in the residence as well. During the execution of the search warrant, agents located Eric Carter sleeping in a red Monte Carlo outside the residence at 1305 Harvey Street.

13. Detective Hawley and I interviewed Lyndzie Clark and she told us that she knew the individual who was in the bedroom with her when the search warrant was executed as "Grizzle." Lyndzie Clark said that Grizzle was her boyfriend. We showed her surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and she identified the individual in the photographs who had committed the robbery as Grizzle (Ramon Mitchell). Lyndzie Clark denied any knowledge of the bank robbery.

14. Detective Hawley and I also interviewed Jessica Clark. Jessica Clark said that Lyndzie Clark is her sister and that "Grizzle" is her sister's boyfriend. The agents showed her surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and she identified the individual in the photographs who had committed the robbery as Grizzle (Ramon Mitchell).

15. FBI Special Agent Michael Dalide interviewed Carlos Royster. Royster stated that he knew the other adult male who was in the house at the time the search warrant was executed as "Grizzle" and also as Cody Banks. On August 14, 2008, Royster talked to Cody and Cody told Royster that he and some other individuals did a stick up in Roscoe, Illinois. Special Agent Dalide showed Royster surveillance photographs from the Blackhawk State Bank robbery on August 14, 2008 and he identified the individual in the photographs who had committed the robbery as Cody Banks (Ramon Mitchell).

16. Detective Hawley and I interviewed Eric Carter. Carter told us that he was involved in the planning of the robbery of the Blackhawk State Bank prior to August 14, 2008. Carter also provided a signed written statement. In his statement Carter said that on August 13, 2008 he was at 1305 Harvey Street and met with an individual he knows as "Grizzle" and another male he knew as "Trudy." Carter said that Trudy told him that he had a "lick," which is another name for a robbery, at a bank. Trudy said that he had a girl that was working on the inside of the bank. Carter stated that Carter, Trudy and Grizzle all got into Trudy's car, a black, two door car, and drove from Beloit south on Route 51 to a bank in Illinois in a town which starts with an "R." Trudy drove to the parking lot of a bank and Carter, Trudy and Grizzle all discussed where to park the vehicle during the robbery of the bank. On the way back to Beloit, Carter, Trudy and Grizzle discussed leaving the state of Wisconsin after the robbery and Grizzle suggested that Carter and Grizzle go to Atlanta for a few weeks after committing the robbery. Carter stated that on August 14, 2008, between 2 and 3

p.m., he, Trudy and Grizzle drove in Trudy's black, two door car to the same bank that they had driven to on August 13, 2008. Trudy parked in the bank parking lot and left the engine running. Grizzle got out of the car and walked into the bank. When Grizzle left the car, he had a set of sunglasses with him and a red and white book bag. Approximately 5 minutes later, Grizzle returned to the car and Trudy put the car in drive and drove out of the parking lot. Trudy drove them to Trudy's mother's house in Beloit where Carter, Trudy and Grizzle went inside. When they were inside the house, Grizzle dumped out the money from the backpack. Carter believed that there was approximately \$50,000 in cash in the backpack. Carter stated that Trudy told Carter that he should get \$10,000 and that Trudy and Grizzle should split the rest. Trudy handed Carter \$10,000 in cash and told him to take it. Carter took the money. Carter said that he and Grizzle left the residence and walked to 1305 Harvey Street. Carter said that when he arrived at the residence, he counted the money and that it was \$10,000. Carter said that he took out a couple hundred dollars for himself and that he gave the rest of the \$10,000 to Grizzle to hold for Carter.

17. FBI Special Agent Randall Sealby and Detective Hawley interviewed Ramon Mitchell. During that interview, Mitchell agreed to provide a written statement. In his written statement, Mitchell said that he was approached by a white male (hereinafter referred to as "Individual B") in Beloit a few weeks prior to August 14, 2008. Mitchell did not know Individual B's name. Individual B told him that he had a deal to make some money and that Mitchell could possibly make \$50,000. Mitchell said that Individual B could possibly be related to the bank teller. Mitchell said that the day before the bank robbery, Individual B called him and told him that they were going to do this tomorrow. Mitchell also admitted to going to the Blackhawk State Bank on August 14, 2008 in a blue Nissan with Eric Clark and Individual B. Mitchell stated that prior to going to the bank, Individual B drove Mitchell to a side road and that Individual B told Mitchell to go get a red and

white book bag which was by a dumpster. Mitchell said that he asked Individual B "what's she wearing?" Individual B said she would be wearing a green and grey shirt. Mitchell said that he knew that Individual B was getting his information from Trudy, a black male that Mitchell and Individual B knew. Mitchell also admitted entering the bank and giving the teller a red and white backpack but denied presenting a note to the teller demanding money. Mitchell later acknowledged that he observed a note in the backpack with the words "all the money" on it prior to giving it to the teller. Mitchell stated that the teller filled the backpack up with money without him asking her to do so. Mitchell said that after he left the bank he got back into the car with Clark and Individual B and he was given a ride back to Beloit. Mitchell stated that he left the backpack in the vehicle when he got out and that he did not get any proceeds from the robbery.

18. On August 18, 2008, Detective Hawley and I interviewed Tremain Gordon. Gordon uses the nickname "Trudy." Gordon denied being involved in the robbery of the Blackhawk State Bank on August 14, 2008. Gordon also stated that his girlfriend, Emily Jones was also not involved in the robbery. Gordon initially stated that on August 14, 2008 he was with Eric Carter and "Griz" (Ramon Martinez) on the east of side of Beloit, Wisconsin after the robbery of the Blackhawk State Bank and that he was present when the proceeds of the robbery were divided. Gordon admitted to receiving approximately \$20,000 in cash. Gordon later stated that Carter and Martinez told him to go to Gordon's grandmother's house in South Beloit and look for the money on the porch. Gordon said he went to his grandmother's house and picked up the \$20,000. Gordon also stated that he told Carter and Martinez what Emily Jones was wearing on the day of the robbery.

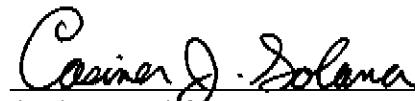
19. On August 18, 2008, Detective Hawley and I interviewed Emily Jones. Jones admitted to her involvement of the robbery of the Blackhawk State Bank on August 14, 2008 and agreed to provide written statements regarding her involvement. Jones stated that her boyfriend is Tremain

Gordon. Gordon's nickname is "Trudy." Jones said that she and Gordon planned a robbery of the Blackhawk State Bank. Jones provided Gordon with the information about when to commit the robbery and Gordon found the people to commit the robbery. Jones said that after they planned the robbery, she and Gordon picked out a date and went through with the robbery. Jones stated that she did not want to hurt anyone so they planned the robbery to "be as painless as possible." Jones stated that at approximately 12:00 p.m. on August 14, 2008, Gordon came to pick her up from the Blackhawk State Bank. Jones said that she and Gordon went to a park and talked about trying to get the "Fed" shipment or the money from the teller drawers. Jones told Gordon to make sure that he told the person who came into the bank to bring a bag and wear a disguise. Jones said she called Gordon shortly after they were finished with lunch and told Gordon to let the other guys know that anytime would be alright to start. Jones said that Gordon came to the bank and gave her some cigarettes and she told Gordon again that "we can do this anytime." Jones stated that she did not know who would be coming into the bank. Jones said that she was surprised that when a black man came in the bank to commit the robbery instead of a white man. Jones said that she was originally told by Gordon that it would be a white man who would be coming into the bank. Jones stated that when the black male came into the bank the black male gave her a backpack and she filled it up with money from her teller drawer and from a "Fed" shipment which was on a counter in the back of the bank. Jones stated that Gordon picked her up on August 14, 2008 at approximately 6 p.m. After Gordon picked Jones up they went to Gordon's grandmother's house to pick up their share of the bank robbery proceeds. Gordon went inside the back porch of the residence and came out with a black backpack which contained approximately \$20,000. Jones stated that she and Gordon hid the money at their residence in South Beloit for four days until she allowed FBI agents to search her

residence. Jones stated that after the robbery, Jones and Gordon spent approximately \$1,000 on clothes and shoes.

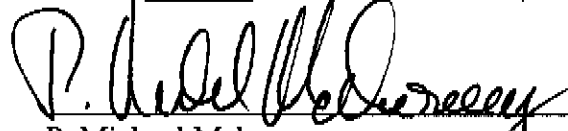
20. During our interview of Jones, we went to her residence in South Beloit, Illinois after Jones gave us consent to search her residence. During the search of her residence we located and seized approximately \$20,000 in cash hidden in a vent in a bathroom in the residence.

21. The information contained within this affidavit is true and correct to the best of my knowledge and belief.



CASIMER SOLANA
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS 19TH DAY OF AUGUST, 2008.



P. Michael Mahoney
United States Magistrate Judge
Norther District of Illinois